

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Michael Melvin, *et al*

Plaintiffs,

v.

Honorable James Francis Kenney, *et al*

Defendants.

Civil Action No. 20-3529

**PLAINTIFFS' MOTION FOR EXTENSION OF TIME TO FILE
FIRST AMENDED COMPLAINT**

Plaintiffs Michael Melvin, Dan Farrelly, Brion Milligan, Mark Palma, Robert Bannan, Steven Hartzell, and Jesus Cruz (collectively "Plaintiffs") by and through counsel, respectfully request a 14-day extension of time, until and including May 21, 2021 to file a plaintiffs' First Amended Complaint consistent with this court's Order dated April 22, 2021.

The reason for this request is that lead counsel, Larry Klayman, admitted *pro hac vice* in this matter, is on vacation and will be unavailable next week in sufficient time to prepare, in concert with the plaintiffs, an Amended Complaint that will comply with the court's requirements. This brief extension will not prejudice Defendants or the Court.

Counsel for Plaintiffs have sought consent from opposing counsel for this motion who has stated that defendants oppose this motion .

Dated: April 30, 2021

Respectfully submitted,

/s/ Andrew Teitelman
Andrew Teitelman, Esq.
380 Red Lion Rd Ste 103
Huntingdon Valley, PA, 19006
Bar No: 43545
Tel: 267-255-6864

Counsel for Plaintiffs

Larry Klayman, Esq.
7050 W. Palmetto Park Rd
Boca Raton FL 33433
561-58-5336
leklayman@gmail.com

Pro Hac Vice

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 30th day of April, 2021, a true copy of the foregoing was filed via ECF and served to all counsel of record through the Court's ECF system.

/s/ Andrew Teitelman